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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF LOS ANGELES

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11 CHURCH OF SCIENTOLOGY OF) Case No. C 420 153
12 CALIFORNIA, INC., a)
13 California corporation,) RESPONSES TO DEFENDANT
14 Plaintiff,) AND CROSS-COMPLAINANT'S
15 vs.) REQUEST FOR PRODUCTION
16 GERALD ARMSTRONG, et al.,) OF DOCUMENTS
17 Defendants.)
18 MARY SUE HUBBARD,)
19 Intervenor.)

20 TO DEFENDANT GERALD ARMSTRONG AND TO HIS ATTORNEY OF RECORD:

21 Plaintiff Church of Scientology of California answers and objects and
22 otherwise responds to the request for production of documents by
23 defendant Gerald Armstrong, as follows:

- 24
- 25 1. Objection: The request is overbroad, burdensome, irrelevant and
 - 26 not calculated to lead to the discovery of admissible evidence.
 - 27 2. Objection. See response to request No. 1.
 - 28 3. Objection: The request seeks to invade the internal workings of

1 a religious organization which is protected by the First Amendment. In
2 addition, this request is not relevant nor calculated to lead to the
3 discovery of admissible evidence.

4 4. Objection: The request is overbroad, burdensome and seeks to
5 invade the attorney-client and attorney work product privileges.

6 5. Objection: The request is irrelevant and not calculated to lead
7 to the discovery of admissible evidence. However, without waiving the
8 objection, plaintiff has searched all of its records, files, archives and
9 storage areas and no such reports were found. Investigation is
10 continuing through voluminous Church files. If the materials requested
11 are located, they will be provided for inspection.

12 6. Objection: See response to request No. 5.

13 7. Objection: See response to request No. 5.

14 8. Objection: See response to request No. 5.

15 9. Attached.

16 10. Plaintiff has searched all of its records, files, archives and
17 storage areas and no such documentation was found.

18 11. Plaintiff has searched all of its records, files, archives and
19 storage areas and no such order has been found.

20 12. Attached.

21 13. Objection: See response to request No. 5.

22 14. Attached.

23 15. Attached.

24 16. Objection: See response to request No. 5.

25 17. Objection: This request is overbroad, burdensome, not relevant
26 nor calculated to lead to the discovery of admissible evidence. In
27 addition, certain of the materials requested are protected by the First
28 Amendment, certain are protected by the attorney-client privilege, and

1 certain are protected by the attorney work product privilege.

2 18. Objection: See response to request No. 1.

3 19. Attached.

4 20. Objection: This request is overbroad, burdensome and, to a
5 great extent, irrelevant. However, plaintiff has located and is prepared
6 to provide for inspection certain materials which are relevant to this
7 suit that would constitute correspondence of the nature requested.

8 21. Objection: This request is overbroad, burdensome, irrelevant,
9 not calculated to lead to the discovery of admissible evidence, and seeks
10 to violate both the attorney-client and attorney work product privileges.

11 22. Objection: This request is irrelevant and not calculated to
12 lead to the discovery of admissible evidence.

13 23. Objection: See response to request No. 22.

14 24. Attached.

15 25. Plaintiff has searched its records, files, archives and storage
16 areas, and has attached all of such correspondence found.

17 26. Objection: See response to request No. 5.

18 27. Objection: See response to request No. 5.

19 28. Objection: This request is not relevant nor calculated to lead
20 to the discovery of admissible evidence. In addition, plaintiff has none
21 of the materials requested in its possession and hereby informs defendant
22 Armstrong that the L. Ron Hubbard Public Relations Bureau is not part of
23 plaintiff Church of Scientology of California, but is rather a division
24 of the Church of Scientology International.

25 29. Objection: See response to request No. 28.

26 30. Objection: See response to request No. 5.

27 31. Objection: See response to request No. 5.

28 32. Objection: See response to request No. 1. Disbursement

1 vouchers are kept in chronological order and this request would require
2 searching each and every disbursement voucher for each and every area of
3 the Church for almost an eleven year period. Such a task would require
4 hundreds, if not thousands, of man hours. However, plaintiff is prepared
5 to provide for inspection disbursement vouchers for monies disbursed to
6 Gerald Armstrong during the period 1980 through 1981 in connection with
7 the Biography Project, some of which disbursement vouchers are in the
8 possession of plaintiff. A search is continuing for any further such
9 vouchers, and they will likewise be made available for inspection if and
10 as discovered.

11 33. Plaintiff has attached copies of all of the withholding forms
12 located within its files.

13 34. Objection: See response to request No. 22.

14 35. Objection: See response to request No. 22.

15 36. Objection: See response to request No. 5.

16 37. Objection: See response to request No. 5.

17 38. Objection: See response to request No. 5.

18 39. Objection: See response to request No. 5.

19 40. Objection: See response to request No. 5.

20 41. Objection: See response to request No. 22.

21 DATED: November 7, 1983

22
23 By: 
24 JOHN G. PETERSON, ESQ.